

- Discussion of footprint should be initiated immediately following initiation of discussion of RAOs, prior to technologies/alternatives (footprint should be considered when evaluating technologies/alternatives; to some degree this discussion is underway, as the team is working through the issue of bounding maps and AQ is evaluating the need for alternative-specific hydrodynamic and sediment transport (HST) simulations and considering rules for representing remediation of partial grid cells). Please swap lines 7 and 8.
- Please note, discussion of footprint should include an initial discussion of footprint derivation rules, followed by discussion of actual footprint based on RALs/SWACs Please note that Discussion of interim remedy alternatives should include justification of technologies/process options (and should include consideration of the technologies/process options being employed for the Lower 8.3)
- Discussion of engineering assumptions and FS metrics can reasonably be handled simultaneously, so lines 9 and 10 can be combined.
- Arriving at consensus on schedule, RAOs, footprint, technologies/alternatives, engineering assumptions/FS metrics, modeling approach, and FS Work Plan by 12/24/18 is very aggressive and probably unrealistic when factoring in two holiday weeks, but can remain in the schedule.
- 16 weeks for CPG to perform and review FS-level modeling simulations appears quite conservative (note, however, that the degree of alternative-specific modeling is a factor here, and we will need to discuss the appropriate duration)
- EPA review of FS modeling simulations can be performed during review of the draft FS Report (or could be performed separately/in parallel, beginning as soon as simulations are complete, to gain some streamlining)
- 7 months to deliver the draft FS Report to EPA appears overly conservative when factoring in multiple critical decisions already being made prior to beginning the draft FS development (and it seems reasonably possible that work on the draft FS Report could begin before all of the milestones in bullet #2 above are complete) but can remain in the schedule
- 4 weeks seems insufficient for EPA/NJDEP review of the draft FS Report, however if the meetings are successful and conclusive, the review should easy, so the schedule does not need to change.
- EPA Administrator briefings will be needed following the final FS Report (after FS and prior to NRRB/CSTAG briefing), prior to the PP, and prior to the ROD, additional time needs to be factored in. Please add an extra 2 weeks for each briefing.
- NRRB/CSTAG preparations will begin internally with a draft FS in August, so EPA will review from August to September and will likely have the meeting in October or November. There will also need to be a review period for their briefing package. Please amend accordingly.
- NJDEP review of the PP and ROD should be accounted for
- 3 months to negotiate and sign an AOC after the ROD is released is not realistic based on other discussions we've had about the AOC process (but the team should discuss any and all options to accelerate the AOC)